



February 22, 2010

Envision San Jose Task Force

Re: recommended amendment to land use scenarios to rely upon "actual jobs" and not just jobs capacity for balancing employment and housing

Dear Envision San Jose Task Force members;

Several issues have become clear regarding the "jobs capacity" concept that is central to the choice of land use scenarios:

1. The jobs capacity number given in each scenario will not actually occur. Staff has openly admitted this; they have discouraged those of us who are dismayed by environmentally destructive Jobs:Employed Residents ratios from taking them seriously; and they have said the numbers should be seen at most as indicating relative degrees of emphasis.

2. The numbers are being used for planning purposes as if they will actually occur. Last meeting's discussion of VMT used the numbers as if they would occur, and the General Plan EIR will do the same.

3. If for some reasons the numbers are actually reached or nearly reached, the CEQA process for mitigating or stopping the environmental consequences will have long passed, because the EIR will be finalized many years before the actual development.

As has been discussed in many previous communications, any ratio of actual jobs to employed residents that exceeds a 1:1 ratio will require massive amounts of commuting from outside Santa Clara County, primarily residents of Central Valley coming to our area by car. City staff is concerned that any jobs capacity to employed residents ratio of 1:1 or less will result in an actual jobs level that is far lower, and hurt the City's finances.

The Committee for Green Foothills proposes the following compromise that could be included as an amendment to any current land use scenario:

The land use scenario should include a performance criteria requiring that the actual jobs to employed residents ratio to remain no higher than a 1:1 ratio. Development of jobs capacity in the City should happen in stages for different areas, and once the 1:1 ratio is reached, additional areas for additional capacity should not be readied for new jobs until the residential development level is also matched and planned to occur at approximately the same time.

An alternative recommendation is to "backload" the excess actual jobs, so that once the City has reached the 1:1 actual jobs:employed residents ratio, the jobs development cannot occur faster than residential development until all the planned residential development has occurred. This alternative is inferior to our main proposal because it will still allow severe environmental consequences from inadequate housing relative to jobs, but it is superior to the proposals currently in front of the Task Force.

The Committee for Green Foothills notes that adopting this recommendation as a mandatory performance criterion can greatly improve the planning process and reduce the environmental impacts in the resulting EIR. It places an upper limit on actual jobs that is much closer to what will actually occur, which means such issues as VMT calculations can reflect something approaching reality. It also eliminates the worst environmental impacts from

commuting that staff would otherwise have to acknowledge in the EIR,¹ so the EIR that the City would publish with this criterion included will show fewer negative and more positive environmental effects.

As we have mentioned before, any increase over the current baseline jobs-to-employed residents ratio would be environmentally harmful, but we also recognize that some change is likely. Including larger levels of residential development in the City is important in our housing-poor region, especially transit-oriented and senior-oriented development. Above and beyond all that is the need to keep a balance of actual jobs to employed residents that is not available in most of the current land use scenarios.

Please contact us if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian Schmidt", with a stylized flourish at the end.

Brian A. Schmidt
Legislative Advocate, Santa Clara County

¹ We believe a feasible mitigation for those impacts would be a similar performance criterion in the EIR, so the City has to consider this idea in any case.